

K&L GATES LLP

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*Attorneys for Arconic Inc. (f/k/a Alcoa Inc.)
and Arconic Domestic, LLC (f/k/a Alcoa
Domestic, LLC as successor in interest
to A.P. New Jersey, Inc.)*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

BOROUGH OF EDGEWATER,

Plaintiff,

v.

WATERSIDE CONSTRUCTION,
LLC; 38 COAH, LLC; DAIBES
BROTHERS, INC.; NORTH RIVER
MEWS ASSOCIATES, LLC; FRED A.
DAIBES; TERMS
ENVIRONMENTAL SERVICES,
INC.; ALCOA INC. (formerly known as
“Aluminum Company of America”);
ALCOA DOMESTIC LLC, as
successor in interest to A.P. NEW
JERSEY, INC.; JOHN DOES 1-100;
and ABC CORPORATIONS 1-100,

Defendants,

and

WATERSIDE CONSTRUCTION,
LLC; 38 COAH, LLC; DAIBES
BROTHERS, INC.; NORTH RIVER
MEWS ASSOCIATES, LLC; and
FRED A. DAIBES,

Case No.: 2:14-CV-05060-JMV-JBC

Hon. John M. Vazquez, U.S.D.J.
Hon. James B. Clark, III, U.S.M.J.

NOTICE OF MOTION

Defendants/Third-Party Plaintiffs,

v.

NEGLIA ENGINEERING
ASSOCIATES,

Third-Party Defendant,

and

ALCOA DOMESTIC, LLC, as
successor in interest to A.P. NEW
JERSEY, INC.,

Defendant/Third-Party Plaintiff,

v.

COUNTY OF BERGEN and RIVER
ROAD IMPROVEMENT PHASE II,
INC., and HUDSON SPA, LLC,

Third-Party Defendants.

To: **COUNSEL:**

PLEASE TAKE NOTICE that on January 22, 2019 at 9:00 a.m., or on such date and at such time as counsel may be heard, Defendants/Third-Party Plaintiffs Arconic Inc. (f/k/a Alcoa Inc.) and Arconic Domestic, LLC (f/k/a Alcoa Domestic, LLC as successor in interest to A.P. New Jersey, Inc.) (collectively “Arconic”), through their attorneys, K&L Gates LLP, will move this Court, before the Honorable John Michael Vazquez, U.S.D.J., at the Martin Luther King, Jr. Federal Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, for

entry of an Order in the form annexed hereto granting Arconic's motion to stay this proceeding.

PLEASE TAKE FURTHER NOTICE that Arconic shall rely upon the supporting Brief and the Certification of Dana B. Parker, with exhibits attached hereto.

PLEASE TAKE FURTHER NOTICE that, if opposed, Arconic requests oral argument in this matter.

Dated: Newark, New Jersey
December 17, 2018

By: 
Dana Parker, Esq.
K&L GATES LLP
One Newark Center, Tenth Floor
Newark, NJ 07102
(973) 848-4000
Attorneys for Arconic Inc. (f/k/a Alcoa Inc.) and Arconic Domestic, LLC (f/k/a Alcoa Domestic, LLC as successor in interest to A.P. New Jersey, Inc.)